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SECTION 1.0
INTRODUCTION AND BACKGROUND

1.1 DESCRIPTION OF REVISED PROJECT – RESIDENTIAL DEVELOPMENT

1.1.1 Revised Site Plan

The City of Goleta has prepared this Addendum to the Comstock Homes Development and Ellwood Mesa Open Space Plan Final EIR (FEIR) (June 2004; State Clearinghouse No. 2003071179) in accordance with the California Environmental Quality Act (CEQA). This Addendum addresses the potential environmental impacts of the revised site plan (dated June 16, 2004) submitted to the City of Goleta by the applicant (Comstock Homes) on June 18, 2004. The revised site plan was received too late for it to be considered and included in the FEIR. The revised site plan is presented on Figure 1-1 of this FEIR Addendum. The purpose of the revised site plan is to reduce environmental impacts, including impacts to sensitive biological resources and visual resources, relative to the originally proposed 78-unit site layout that was assessed in the Draft and Final EIRs for the project. The revised site plan refines the site layout and reduces residential development related environmental impacts associated with the originally proposed 78-unit project as well as the 69-unit Comstock Alternate 1 site plan which is discussed and evaluated in Master Response L in Appendix E (Response to Comments) of the FEIR. The revised site plan results in lesser environmental effects compared to the originally proposed 78-unit project assessed in the Draft and Final EIRs, thus it is appropriately addressed in this FEIR Addendum.

It is the finding of the City of Goleta that the previous environmental document 04-EIR-01, as amended by the Addendum dated June 21, 2004, may be used to fulfill the environmental review requirements of the revised 68-unit project. The revised project meets the conditions for the application of State CEQA Guidelines Section 15164 and preparation of a new EIR or recirculation of 04-EIR-01 is not required.

The City of Goleta has worked with the local environmental community, the public, and the applicant (Comstock Homes) to modify the layout of the proposed residential development to: 1) minimize impacts to sensitive biological habitat and associated setback buffers; 2) reduce visual impacts; and 3) address hydrology and water quality issues associated with development in the Devereux Creek Watershed. The relationship of the residential development proposed under the Comstock Alternate 2 site plan to sensitive biological habitat (i.e., wetlands, streams, eucalyptus woodland/raptor ESHAs, and native grasslands) and associated setback buffers is presented on Figure 1-2. For comparison purposes, the originally proposed 78-unit residential development layout that was the basis for the Draft and Final EIRs for the project is also shown on Figure 1-2 of this FEIR Addendum.

The key changes and improvements to the site plan as proposed under the revised site plan relative to the originally proposed 78-unit site layout analyzed in the Draft and Final EIRs are:

- Reduction in number of residential units from 78 to 68 (i.e., reduction of 10 units)
- Conversion of approximately 46 percent of the 68 units from 2 story to 1 story homes
- Reduction of the number of homes in the northeastern development pod from 7 to 6; conversion of the remaining 6 homes in the pod to one story; and lowering of the finished grade in this area by approximately 4 to 12 feet (depending on location) to lower roofline elevations and help maintain existing views, primarily to the Pacific Ocean and the Channel Islands
- Addition of retaining wall around northeastern residential pod to stabilize cut slopes and deletion of the previously proposed sound wall south of Hollister Avenue (lowering of finished grade in northeastern residential pod negates the need for the sound wall); the retaining wall will include a safety fence on top
- Avoidance of eucalyptus woodland/raptor ESHAs and associated setback buffers on southwest and southeast borders of residential development footprint (note: minimum setback buffers are 50 to 100 feet depending on location)
- Substantial reduction in fill activities and residential development in vicinity of Drainage B
- Relocation of access road to the northeastern residential pod development and associated avoidance of wetland features in vicinity of Drainage A1
- Addition of a 20-foot-wide setback buffer along northwest property line to avoid need to remove the majority of eucalyptus trees (non-ESHA) in this area and maintain this natural vegetative screen
- Addition of 10-foot-wide buffer along northern property line to increase distance between northern edge of development and Hollister Avenue, including avoidance of need to remove existing trees (non-ESHA) in this buffer area
- Addition of sewer lift station (refer to Section 1.1.2 for more information)

The 68-unit revised site plan represents the applicant's (Comstock Homes) project redesign to address the City of Goleta's and the local environmental community's concerns and, as such, is considered to be environmentally preferable to the originally proposed 78-unit project as well as the Comstock Alternate 1 site plan.

1.1.2 Sewer Lift System

The proposed Comstock Homes Development project would interconnect via gravity flow to the Goleta West Sanitary District's (GWSD) Devereux Creek sewer line (trunkline). As discussed in Section 4.3.3.2.1 of the FEIR under Impact H/WQ-4 (Devereux Creek Sewer Trunkline Connection), the project as proposed by the applicant (Comstock Homes) would discharge an estimated 13,100 gallons of sewage on average per day to the Devereux Creek sewer trunkline.

Figure 1-1
Comstock Revised Site Plan

Figure 1-2
Wetlands, Stream Corridors, Eucalyptus Woodlands, and Native Grasslands on Comstock Revised Site Plan

Much of GWSD's Devereux Creek trunkline is located in the riparian corridor of Devereux Creek in a designated Environmentally Sensitive Habitat Area (ESHA). The sewer line segment immediately downstream of the development site on the Santa Barbara Shores parcel has no history of leaks (likely due to the absence of dense eucalyptus in the riparian corridor adjacent to the line). However, the line segment east of the Santa Barbara Shores parcel (east of Santa Barbara Shores Drive) has experienced cracks from root intrusion. Potential sewer leaks in the Devereux Creek riparian corridor represent a long-term human health and water quality hazard in the Devereux Creek watershed. Ongoing sewer line maintenance activities in the riparian corridor, which include clearing of vegetation, also present a long-term biological impact and water quality threat due to physical maintenance/construction activities. The addition of flows into the line from the Comstock Homes development would potentially add to and/or prolong the duration of this water quality threat.

The portion of the line that has experienced cracks in the past is proposed to be upgraded by the GWSD. Consequently, much of the potential water quality threat posed by continued operation of this line segment would be eliminated. Furthermore, the line segment that traverses the Santa Barbara Shores property has no history of leaks (Nation, 2004). GWSD proposes several other upgrades to the sewer lines in the Ellwood area. One of these upgrades would partially eliminate flows into the Devereux Creek trunkline by intercepting flows from north of Hollister Avenue with a new Hollister trunkline. Once the new Hollister trunkline is installed, the Devereux Creek trunkline segment that traverses Santa Barbara Shores property would receive flow from one existing source – the Sandpiper Golf Course maintenance building located at Hollister Avenue, immediately west of the Comstock Homes proposed development site – thus further reducing the volume of sewage flows and the potential consequences of future leaks in the Devereux Creek area.

The potential long-term risks to water quality associated with the continued use of the Devereux Creek trunkline could be further reduced by connecting the Comstock Development to the Hollister trunkline, as specified in FEIR recommended mitigation measure H/WQ-3. Due to site topography, use of the Hollister trunkline will require construction, operation, and maintenance of a lift station on the southern end of the Comstock Development in Lot 72 (see Figures 1-1 and 1-2), and installation of a force main to connect to the Hollister Avenue trunkline. The existing Hollister trunkline may have insufficient capacity to accommodate the sewage inflow from the Comstock Homes Development until the GWSD upgrade is completed as planned within the next 5 years. Comstock Homes has proposed, with the City of Goleta's encouragement, to install the lift station facilities on Lot 72 plus a buried, in-road pipeline interconnect to the GWSD sewer line in Hollister Avenue for discharge of the Comstock Homes Development effluent once the GWSD Hollister trunkline facilities are available to receive the input. It is currently planned that the Comstock Homes Development will also be connected via gravity flow to the Devereux Creek trunkline until such time that the GWSD Hollister Avenue trunkline is available. Once the Hollister Avenue sewer facilities are available, discharges to the Devereux Creek trunkline from the Comstock Homes Development would

cease. Refer to Section 2.2.2 of this FEIR Addendum for more details on the planned sewer lift station facilities.

1.1.3 Southern Detention Basin/Bioswale

The revised site plan as proposed by Comstock Homes does not include the southern detention basin/bioswale complex that was included with the originally proposed 78-unit site plan that was analyzed in the Draft and Final EIRs (refer to Figure 1-2 in this FEIR Addendum). The applicant's site runoff analysis for the revised site plan determined that the reduced number of residential development lots allows for the elimination of the originally proposed southern detention basin. According to the applicant, the remaining northern detention basin is sized appropriately and would utilize a cipolleti weir to maintain pre-development runoff levels. In addition, the northern detention basin is proposed to operate as a biofilter for the northern portion of the site which is tributary to the detention basin. The applicant proposes to capture and treat site runoff utilizing three primary methods, as follows:

- Northeastern pod of 6 homes; collection system and catch basin(s) with mechanical filter system for treatment prior to discharge to Drainage A2
- Northwest lots upgradient of northern detention basin; collection system routed to northern detention basin/bioswale prior to discharge to Drainage A1
- Southern lots; collection system and catch basins with mechanical filtration units for treatment prior to discharge to the lower portion of Drainage B

Ultimately, all site runoff that flows from the Comstock Homes site flows to Devereux Creek. The applicant's Grading and Drainage Plan will be reviewed by the City of Goleta during final plan check. If the City's review of the applicant's Grading and Drainage Plan determines that the northern detention basin/bioswale is insufficient for limiting the overall amount of post-development runoff to pre-development volumes, the City will require the applicant to construct a southern detention basin/bioswale on the lot reserved on the southeast corner of the development footprint. Lot 72 has been reserved for both the planned sewer lift station facilities and the potentially required southern detention basin/bioswale. Lot 72 is located outside and south of the originally proposed 78-unit development footprint as analyzed in the FEIR (refer to Figures 1-1 and 1-2). If the southern detention basin/bioswale is constructed, it would discharge to Drainage B. Refer to Section 2.3 of this FEIR Addendum for more information regarding the potentially required southern detention basin/bioswale.

1.2 PROPOSED PROJECT – OPEN SPACE PLAN

As discussed in Section 1.1, the proposed revised site plan maintains the eucalyptus woodland/raptor ESHA, plus 50- to 100-foot buffers, along the southwest border of the site. This area will be deeded back to the City of Goleta by the applicant (Comstock Homes) for incorporation into the Ellwood Mesa Open Space.

In addition, the new open space access parking lot to be constructed east of the residential development and south of Hollister Avenue has been redesigned to better accommodate equestrian trailers (refer to Figure 1-2). The overall footprint and dimensions of the parking lot are unchanged from that assessed in the Draft and Final EIRs. However, the internal parking layout has been redesigned to include diagonal double spaces (refer to Figure 1-2) that will accommodate vehicles with attached equestrian trailers.

SECTION 2.0

PROPOSED PROJECT-COMSTOCK REVISED SITE PLAN AND ASSOCIATED FEATURES

2.1 MODIFIED RESIDENTIAL DEVELOPMENT SITE LAYOUT

The layout of the Comstock Homes Development as previously proposed and analyzed in the Draft and Final EIRs is presented on Figure 2-4 in the Final EIR. The Comstock 68-unit revised site plan that is addressed in this FEIR Addendum has been superimposed in Figure 1-2 over the previously proposed 78-unit site layout assessed in the Draft and Final EIRs. A summary list of the key site layout differences between the current 68-unit Comstock revised site plan and the previously proposed 78-unit site layout was presented previously in Section 1.1.

As discussed in Section 1.1, the proposed revisions to the site layout are intended to avoid or reduce project impacts. An assessment of the environmental effects of the 68-unit Comstock revised site layout relative to the previously proposed 78-unit layout is included in Section 4.0 of this FEIR Addendum.

The 68-unit Comstock revised site plan will involve fewer residential units than the previously proposed 78-unit development. Additionally, the Comstock revised site plan avoids sensitive biological habitat areas (and setback buffers) that the previously proposed 78-unit project would have impacted. The Comstock revised site plan avoids the sensitive biological habitat areas via elimination and relocation of residential units as well as reconfiguration of the internal road layout within the residential development. In addition, the Comstock revised site plan is intended to reduce visual impacts by lowering the base grade elevation of the six homes in the northeastern pod development and by converting all six homes to 1 story from 2 story. Additionally, over 42 percent of the remaining 62 homes proposed under the Comstock Alternate 2 site plan have been converted from 2 story to 1 story homes. Figure 1-2 identifies which homes are proposed to be 2 story and 1 story; the homes in the previously proposed 78-unit development were all 2 story homes. The 68-unit Comstock revised site layout-related changes summarized above result in the following earthwork-related changes relative to the previously proposed 78-unit development:

	68-unit Comstock Revised Site Layout	Previously Proposed 78-Unit Comstock Homes Development
Cut-and-Fill		
Cut (yd^3)	59,000	62,000
Fill (yd^3)	52,000	62,300
Volume of Cut Material to be Exported Offsite (yd^3)	7,000	0
Volume of Fill Material to be Imported (yd^3)	0	300
Typical Depth of Grading (feet)	3-4; up to 12	3-4

Other aspects of the construction-related activities for the residential unit component of the Comstock revised site plan are expected to be similar to those described in the Final EIR for the previously proposed 78-unit project.

2.2 SEWER LIFT STATION

Comstock Homes has proposed, at the City of Goleta's direction, to install a sewer lift station on the southern end of the residential development in Lot 72 (see Figures 1-1 and 1-2). The sewer lift station will be installed at the time the residential development is built, but may not be utilized initially if there is insufficient capacity in the GWSD Hollister Avenue trunkline (until GWSD performs its planned upgrades); a sewer main interconnection to the Devereux Creek trunkline will also be constructed. Discharge via gravity flow to the Devereux Creek trunkline would cease once available capacity exists in the Hollister Avenue trunkline. The final design for the required lift station facilities had not been developed at the time this FEIR Addendum was prepared. For the purposes of the FEIR Addendum, the following details regarding the sewer lift station were assumed:

- Lift station facilities will be installed below grade in Lot 72
- Lift station facilities will include underground storage and submerged pumping facilities
- Lift station facilities will be sized to handle an average daily sewage inflow of about 13,100 gallons per day
- Lift station pumps will be electric driven with no air emissions or audible noise beyond the fenceline
- Underground storage tank will be designed to store 24-hour sewage inflow volume
- Associated piping will include 8-inch diameter gravity inflow lines and 2-inch force main to Hollister Avenue trunkline; piping to be installed below ground in residential development roadways
- In the event of an electrical power outage, the lift station facilities would be powered by an emergency standby diesel-powered generator until electrical power from the Southern California Edison electrical grid was restored; the standby diesel generator will be accompanied by a diesel fuel storage tank (estimated storage capacity of 100 gallons) within an appropriately sized containment area

For the purposes of this analysis it is assumed that the diesel powered backup generator would only be used in emergency situations and during periodic safety testing. It is also assumed that the applicant will be responsible for installation of the lift station facilities and piping, although the pumping facilities may not be installed until they are actually needed. Once the residential development was completed and occupied, operation and maintenance of the lift station would be the responsibility of the Home Owner's Association.

2.3 SOUTHERN DETENTION BASIN/BIOSWALE

As discussed in Section 1.1.3 of this FEIR Addendum, the City of Goleta may determine that a southern detention basin/bioswale is needed to limit post-development runoff from the southern portion of the residential development. For purposes of this analysis it is assumed that the southern detention basin/bioswale, if required, would be smaller in size than the planned northern detention basin/bioswale and that the appropriate sizing would be determined during the City of Goleta's final plan check of the applicant's Grading and Drainage Plan. In addition, it is assumed that the southern detention basin/bioswale would be located in Lot 72 along with the sewer lift station facilities discussed previously. It is assumed that the potential southern detention basin would discharge to Drainage B to the west of Lot 72 and that an appropriate energy dissipation device would be installed at the discharge point to prevent erosion and associated water quality impacts in Drainage B and Devereux Creek. The potential southern detention basin/bioswale would be vegetated with native vegetation using seed and/or root stock exclusively from the Devereux Creek Watershed.

SECTION 3.0

PROPOSED PROJECT – CITY OF GOLETA OPEN SPACE

3.1 INTRODUCTION

As discussed in Sections 1.1 and 1.2, the Comstock revised site plan maintains the eucalyptus woodland/raptor ESHA, plus applicable 50- to 100-foot setback buffers along the southwest border of the site. The portion of these areas within the residential development parcel (Parcel #1 of the Tentative Parcel Map) will be deeded back to the City of Goleta for incorporation into the Ellwood Mesa Open Space. No further physical modifications of this area are proposed related to the Comstock Alternate 2 site plan. Minor modifications (e.g., signage, habitat restoration, trail modifications) may be made to the area to be deeded back to the City of Goleta by the applicant as part of the Ellwood Mesa Open Space Plan, which is planned to be published in August of 2004 to incorporate revisions made through the review and adoption process. The following section describes the physical differences between the relocated Ellwood Mesa Open Space access parking lot proposed and assessed in the Draft and Final EIRs and the revised parking lot layout addressed in this FEIR Addendum.

3.2 MODIFICATION OF PARKING LOT FOR EQUESTRIAN TRAILERS

The replacement parking lot assessed in the Draft and Final EIRs (see Section 2.2.1.3 of Final EIR) was designed to provide parking for 40 vehicles, including 2 disabled spaces, plus spaces for 3 horse trailers on the southern end.

The replacement parking lot proposed and assessed in this FEIR Addendum (refer to Figure 1-2) would be located in the same place and have the same access road and overall dimensions as the parking lot assessed in the Draft and Final EIRs. However, the revised parking lot design (see Figure 1-2) provides 35 single-vehicle spaces, including 3 disabled spaces, plus double-length spaces that can accommodate up to 7 vehicles with horse trailers in the central portion of the lot. The 7 double spaces that can accommodate vehicles with horse trailers will also be available for other vehicles on a first-come, first-serve basis (i.e., will not be reserved for equestrian trailers).

SECTION 4.0
ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

4.1 INTRODUCTION

Sections 4.2 through 4.15 of this FEIR Addendum summarize the substantive differences between the environmental impacts of the previously proposed 78-unit Comstock Homes Development (as analyzed in the FEIR) and the now proposed 68-unit revised site plan. In addition, Sections 4.2 through 4.15 discuss the substantive differences in environmental effects between the Ellwood Mesa Open Space Plan as presented in the Final EIR and in this FEIR Addendum. In general, the assessment of the environmental effects (negative and beneficial) of the Ellwood Mesa Open Space Plan presented in the FEIR are unaffected by the 68-unit revised site plan and, thus, the impact findings in the FEIR regarding the Ellwood Mesa Open Space Plan are unchanged.

The environmental assessment presented in this FEIR Addendum focuses on differences in Class I and, to a lesser extent, Class II impacts, as applicable. In general, the 68-unit revised site plan avoids or reduces many of the significant or potentially significant impacts associated with the previously proposed 78-unit project, especially with respect to biological resources and visual resources. The revised 68-unit project would not result in new Class I or Class II impacts and would not result in a substantial increase in severity of previously identified Class I or Class II impacts.

The balance of this section is organized as follows:

- 4.2 – Geology and Geologic Hazards
- 4.3 – Hydrology and Water Quality
- 4.4 – Biological Resources
- 4.5 – Hazards and Hazardous Materials
- 4.6 – Land Use
- 4.7 – Agricultural Resources
- 4.8 – Mineral Resources
- 4.9 – Visual Resources
- 4.10 – Recreation
- 4.11 – Cultural Resources
- 4.12 – Traffic and Circulation
- 4.13 – Noise

- 4.14 – Air Quality
- 4.15 – Public Services

A summary comparison of Class I impacts for the previously proposed 78-unit Comstock Homes Development and the now proposed 68-unit revised site plan is presented in Table 4-1.

4.2 GEOLOGY AND GEOLOGIC HAZARDS

Neither the originally proposed 78-unit Comstock Homes Development nor the now proposed 68-unit revised site plan would result in any Class I impacts related to geology or geologic hazards. The revised site plan would involve less cut-and-fill (59,000 yd^3 of cut and 52,000 yd^3 of fill) than the previously proposed 78-unit project (62,000 yd^3 of cut and 62,300 yd^3 of fill). The revised site plan would involve less surface disturbance and grading, in part, because there are 10 fewer residential units than previously proposed. In addition, the revised site plan would preserve much of Drainage B (refer to Figures 1-1 and 1-2), and avoid the need to fill this area as previously proposed. The revised site plan would involve substantially more grading and alteration of topography in the area of the northeastern residential pod (refer to Lots 63-68 on Figure 1-2) in order to lower the finished floor elevation in an effort to lower the roofline elevations and lessen visual impacts related to scenic coastal views. Comstock Homes' preliminary Grading and Drainage Plan (MAC Design, 2004) indicates that the existing topography will be lowered by up to 12 feet on the northern edge of the northeastern residential pod and transition back to the existing grade on the southern edge of the residential pod. Recent subsurface environmental investigations in this area (Shaler, 2004) indicate that neither groundwater nor bedrock would likely be encountered at the maximum depths of excavation proposed by the applicant (Comstock Homes) in this area.

In summary, the 68-unit revised site plan is considered to be preferable to the previously proposed 78-unit project with respect to geology and geologic hazards due to the need for less surface and subsurface disturbance and the non-filling of the majority of Drainage B. Although the revised site plan would involve more grading and modification of subsurface topography in the northeastern residential pod development area, the additional grading and alteration of topography would lessen visual effects compared to the previously proposed 78-unit project. The applicant's proposed use of engineered retaining walls in the northeastern residential pod area are expected to stabilize cut slopes and thereby mitigate potential unstable slope conditions. The retaining walls are proposed to be up to 10 to 12 feet high on the northern, eastern, and western edges of the northeastern residential pod. The retaining walls on the western and eastern edges would taper down in height to zero at their southern ends.

4.3 HYDROLOGY AND WATER QUALITY

Neither the previously proposed 78-unit Comstock Homes Development nor the now proposed 68-unit revised site plan would result in any Class I impacts to hydrology or water quality. The revised site plan would involve 10 fewer residential units and, thus, less surface disturbance and residential development with associated creation of impermeable surfaces (i.e., less effects on

increases in site runoff). In addition, the revised site plan relocates and re-designs the northern detention basin/bioswale. The northern detention basin/bioswale would still discharge to Drainage A1 as previously proposed. The revised site plan also deletes the previously proposed southern detention basin/bioswale complex (refer to Figure 1-2). As discussed in Section 1.1.3, the revised site plan is designed to utilize the relocated northern detention basin/bioswale to maintain pre-development site runoff levels following residential development of the overall site. The revised site plan is also designed to collect and treat runoff from the southern lots (i.e., down gradient of planned northern detention basin/bioswale) to be collected and treated via a collection system and catch basins with mechanical filtration units prior to discharge to Drainage B. As discussed in Sections 1.1.3 and 2.3 of this FEIR Addendum, the City of Goleta will review the applicant's Grading and Drainage Plan during the final plan check. Based on the City's review, the City may require that the applicant construct a southern detention basin/bioswale in Lot 72 (refer to Figures 1-1 and 1-2).

Runoff from the northern lots (66, 67, and 68) and the access roadway in the northeastern residential pod would be collected in a catch basin and be treated via mechanical filtration prior to discharge to Drainage A2 (as previously proposed). Runoff from the southern lots (63, 64, and 65) in the northeastern residential pod would discharge runoff via sheet flow to the south. The excavation and lowering of the finished grade associated with the revised site plan in the northeastern residential pod would not be expected to substantially alter the hydrology of Drainages A1 or A2 nor differ in effect from the previously proposed 78-unit project because the reduction in elevation does not result in a change in conveyance of drainage (either quantity or direction of flow).

Regardless of whether the applicant's proposed revised site plan utilizing catch basins with mechanical filtration units or the possible southern detention basin/bioswale (to handle runoff from the southern lots and road network) are implemented, most site runoff will be controlled and treated prior to discharge to tributaries to Devereux Creek. The revised site plan would better maintain the natural flows to Devereux Creek via Drainage B than the previously proposed 78-unit project, although these flows are minimal. As discussed in Sections 1.1.2 and 2.2, the City of Goleta will require the applicant to construct a sewer lift station in Lot 72 (refer to Figures 1-1 and 1-2) and to route all sewage effluent from the residential development back via subsurface pipeline to the north to the GWSD Hollister Avenue trunkline once it is capable of receiving the additional flow. Once sewage from the Comstock Homes Development is discharged via the Hollister Avenue trunkline, the connection/discharge to the GWSD Devereux Creek trunkline would be terminated, thereby avoiding any contribution to the potential volume of possible leaks and associated water quality degradation in nearby Devereux Creek. In addition, the potentially associated abandonment by GWSD of the portion of the GWSD Devereux Creek trunkline between the Comstock Homes Development connection point and the downstream Santa Barbara Shores interconnection would preclude the need for ongoing maintenance activities, including vegetation clearing and vehicular disturbance, thereby reducing sediment input and associated water quality impacts on Devereux Creek.

The planned sewer lift station in Lot 72 (see Figures 1-1 and 1-2) would include an underground sewer holding tank with a 24-hour inflow capacity (approximately 13,100 gallons) as well as a diesel fuel storage tank (estimated capacity of 100 gallons) within an appropriately designed and sized spill containment area. The underground sewage holding tank and the diesel fuel storage tank will be designed to minimize the potential for leaks or accidental spills to occur. With implementation of appropriate design and monitoring procedures, no adverse effects on water quality are expected to occur.

In summary, the 68-unit revised site plan is considered to be environmentally preferable to the previously proposed 78-unit project with respect to hydrology and water quality.

4.4 BIOLOGICAL RESOURCES

The 68-unit revised site plan would reduce impacts to biological resources relative to the previously proposed 78-unit project, including impacts to:

- Monarch butterflies (refer to Impact BIO-3 in FEIR and Table 4-1 in this FEIR Addendum)
- Roosting and foraging habitat for raptors, loggerhead shrikes, and bats (refer to Impact BIO-4 in FEIR and Table 4-1 in this FEIR Addendum)
- Direct impacts to wetland features in Drainage A1 in the vicinity of the access road to the northeastern residential pod
- Direct impacts to Drainage B

The 68-unit revised site plan would reduce impacts to biological resources (relative to the previously proposed 78-unit residential development) in the following ways:

- Avoidance of eucalyptus woodland/raptor ESHAs and associated setback buffers on southwest and southeast borders of residential development footprint (note: minimum setback buffers are 50 to 100 feet deep, measured from the canopy or dripline, depending on location)
- Reduction in fill activities and residential development in vicinity of Drainage B
- Relocation of access road to the northeastern residential pod development and associated avoidance of wetland features in vicinity of Drainage A1
- Addition of a 20-foot-wide setback buffer along northwest property line to avoid need to remove the majority of eucalyptus trees (non-ESHA) in this area and maintain this natural vegetative screen
- Addition of 10-foot-wide buffer along northern property line to increase distance between northern edge of development and Hollister Avenue, including avoidance of need to remove existing trees (non-ESHA) in this buffer area

The 68-unit revised site plan would substantially reduce the impact finding for Impact BIO-3 (Monarch Butterflies) from Class I to Class II due to the avoidance of all eucalyptus woodland/raptor ESHAs and associated setback buffers (refer to Figure 1-2). The 68-unit revised site plan would also substantially reduce the impact finding for Impact BIO-5 (Nesting Habitat for Raptors and Loggerhead Shrikes) from Class I to Class II. As discussed previously, the 68-unit revised site plan would also avoid direct impacts to CDFG/CCC wetlands (refer to Figure 1-2), including the vast majority of associated stream/riparian setback buffers. Exceptions include the northeastern residential pod access road crossing of the stream/riparian buffer surrounding Drainage A1 (see Figure 1-2) and the minor encroachment of the relocated northern detention basin/bioswale into the stream/riparian buffer for Drainages A1 and A (see Figure 1-2). The revised site plan northern detention basin/bioswale substantially reduces the encroachment into the stream/riparian setback buffer for Drainage A compared to the previously proposed 78-unit northern detention basin/bioswale encroachment into the same buffer area (see Figure 1-2). The revised site plan relocates the layout of homes and associated roadways in the vicinity of Drainage B (see Figure 1-2), thereby avoiding the need to fill the majority of Drainage B as previously proposed. As discussed in Section 4.3 of this FEIR Addendum, the City of Goleta will now require the applicant to install a sewer lift station in Lot 72 (see Figures 1-1 and 1-2). Once this sewer lift station is operational and sewage flows are rerouted from the GWSD Devereux Creek trunkline, the volume of sewage flow in the Devereux Creek trunkline will be substantially reduced (i.e., estimated 13,100 gallons per day). If the GWSD abandons the section of the Devereux Creek trunkline between the Comstock Homes Development and the next downstream inflow point (south of Santa Barbara Shores development), the ongoing GWSD maintenance activities (including vegetation clearing) in this sensitive biological area would cease. Additionally, the Comstock Homes Development sewage input would no longer contribute to the volume of potential sewage leaks in this segment of Devereux Creek.

The 68-unit revised site plan would also reduce the project's potential contribution to cumulative biological effects in the Open Space Area due to the elimination of 10 residential units with a commensurate reduction in the number of new residents. However, both the previously proposed 78-unit project and the 68-unit revised site plan project would result in Class I impacts for Impact BIO-24. Refer to Impact BIO-24 (Cumulative Impact to Wildlife Resources) in the FEIR as well as Table 4-1 in this FEIR Addendum for more information.

4.5 HAZARDS AND HAZARDOUS MATERIALS

Neither the previously proposed 78-unit Comstock Homes Development nor the now proposed 68-unit revised site plan would result in any Class I impacts related to hazards or hazardous materials.

The planned sewer lift station in Lot 72 (see Figures 1-1 and 1-2) would include a diesel fuel storage tank (estimated storage capacity of 100 gallons) for the lift station emergency generator. The diesel fuel storage tank will be located within an appropriately designed and sized spill containment area. With implementation of appropriate design and monitoring procedures, the

hazard associated with the storage of diesel fuel will be reduced to an acceptable level (Class III impact).

4.6 LAND USE

Neither the previously proposed 78-unit Comstock Homes Development nor the now proposed 68-unit revised site plan would result in any Class I impacts to land use. Impacts related to land use are essentially the same for the previously proposed 78-unit project and the 68-unit revised site plan project, except for a beneficial change related to the future elimination of maintenance activities by the GWSD in the segment of Devereux Creek adjacent to the project.

4.7 AGRICULTURE

Neither the previously proposed 78-unit project nor the 68-unit revised site plan project would result in any impacts on agriculture.

4.8 MINERAL RESOURCES

Neither the previously proposed 78-unit project nor the 68-unit revised site plan project would result in any impacts on mineral resources.

4.9 VISUAL RESOURCES

The 68-unit revised site plan would reduce impacts to visual resources relative to the previously proposed 78-unit project, including impacts related to:

- Incompatibility with surrounding open space areas (refer to Impact VIS-1 - KOP Analysis in the FEIR and Table 4-1 in this FEIR Addendum)
- Obstruction of scenic views, including views of the Channel Islands from Hollister Avenue and views of the Santa Ynez Mountains from the Ellwood Mesa Open Space (refer to Impact VIS-1 in the FEIR and Table 4-1 in the FEIR Addendum)

The 68-unit revised site plan would reduce visual resource impacts (relative to the previously proposed 78-unit residential development) in the following ways:

- Reduce number of residential units from 78 to 68 (i.e., reduction of 10 units)
- Convert approximately 46 percent of the 68 units from 2 story to 1 story homes thereby reducing the mass and appearance of the residential development
- Reduce the number of homes in the northeastern development pod from 7 to 6; conversion of the remaining 6 homes in the pod to one story; and lowering of the finished grade in this area by approximately 4 to 12 feet (depending on location) to lower roofline elevations and help maintain existing views of the Channel Islands from Hollister Avenue and of the Santa Ynez Mountains from the Ellwood Mesa Open Space to the south

- Avoidance of eucalyptus woodland on southwest border of residential development footprint and maintain this natural vegetative screen
- Addition of a 20-foot-wide setback buffer along northwest property line to avoid need to remove majority of eucalyptus trees in this area and maintain this natural vegetative screen
- Addition of 10-foot-wide buffer along northern property line to increase distance between northern edge of development and Hollister Avenue, including avoidance of need to remove existing trees in this buffer area and maintain this natural vegetative screen
- Reduction in fill activities and residential development in vicinity of Drainage B

The proposed relocation of the northern detention basin/bioswale, the addition of the sewer lift station and possible southern detention basin/bioswale in Lot 72, and the Open Space access parking lot reconfiguration would not result in new or adverse visual impacts.

Although the revised site plan would substantially reduce visual resource impacts relative to the previously proposed 78-unit Comstock Homes Development, the revised site plan would still result in Class I impacts to visual resources for Impact VIS-1 (KOP Analysis) and Impact VIS-7 (Loss of Scenic Coastal Views and Open Space). The applicant's revised site plan includes lowering of the finished grade by approximately 4 to 12 feet in the northeastern residential pod from 2 story to 1 story homes. These residential design changes would substantially lower the rooflines of the homes and lessen impairment of Channel Islands views from Hollister Avenue and Santa Ynez Mountain views from the Ellwood Mesa Open Space. In order to assess the appearance and changes in the revised northeastern residential pod, story poles were erected to replicate the rooflines of the planned homes. Photographs of the story poles were taken from various vantage points on June 16 and 17, 2004. Figure 4.9-1 shows the locations of the photograph observation points and Figures 4.9-2 through 4.9-6 show the story poles and associated rooflines (refer to blue ribbons in photos). In addition, Figure 4.9-7 shows a view of the access road entry point for the Open Space parking area off Hollister Avenue. Figure 4.9-4 in the FEIR presents a photograph and simulation of the previously proposed northeastern pod. Figure 4.9-2 in this FEIR Addendum shows a similar view with the story poles. As can be inferred, the revised site plan story poles show that the revised rooflines are much lower than previously proposed and would result in less obstruction of views. Figures 4.9-3 and 4.9-4 in this FEIR Addendum indicate that views of the Channel Islands from the south side of Hollister Avenue would not be blocked by the homes in the revised and lowered northeastern residential pod from the given observation points. The upper portions of the residences, including the rooflines, would be visible in the foreground and would influence the quality of the view setting. Figure 4.9-5 in this FEIR Addendum indicates that the upper portions of the homes in the revised and lowered northeastern residential pod would be visible in the foreground of views of the Santa Ynez Mountains from the open space areas to the south. The homes would not be expected to block or obstruct views of the Santa Ynez Mountains from the open space.

Both the previously proposed 78-unit Comstock Homes Development and the revised site plan would result in Class I impacts for Impact VIS-7 (Impairment of Scenic Coastal Views and

Open Space). The only way to avoid the loss of open space (i.e., conversion to residential) would be to not build the project. If the proposed project is not approved and built, it is expected that the land swap would not occur and the long-term preservation of Ellwood Mesa would not be assured. The possible development of Ellwood Mesa would be expected to result in equal or greater visual impacts than the applicant's Comstock revised site plan.

In summary, the 68-unit revised site plan is considered to be environmentally preferable to the originally proposed 78-unit Comstock Homes Development from a visual resource protection standpoint.

4.10 RECREATION

Both the previously proposed 78-unit Comstock Homes Development and the 68-unit revised site plan project would result in Class I impacts related to the conversion of the 36-acre northwestern portion of Santa Barbara Shores Park to residential use (Impact REC-3 in FEIR). Additionally, both the previously proposed 78-unit and the 68-unit revised site plan contribute to Class I cumulative effects on Open Space usage (Impact REC-8 in FEIR). The 68-unit revised site plan would contribute less to cumulative effects on Open Space usage due to the 10-unit reduction in homes and the commensurate reduction in new residents. The revised site plan reduces the amount of trail closures within the 36-acre development envelope, so that on balance there would be no net loss of trails.

The proposed revised Open Space access parking lot configuration would result in more parking spaces (49 versus 40), including 4 more double-length spaces that could accommodate equestrian trailers (7 versus 3) or other oversized vehicles such as RVs or buses. The equestrian spaces are not restricted to that use group and may also be used by standard vehicles. Of the spaces dedicated for single vehicles in the revised parking lot configuration, 3 are designated for disabled users (i.e., one more than previously proposed). The revised parking lot configuration would not result in a net reduction in parking compared to the initial project.

4.11 CULTURAL RESOURCES

Neither the previously proposed 78-unit Comstock Homes Development nor the now proposed 68-unit revised site plan would result in any Class I impacts to cultural resources. Impacts related to cultural resources are essentially the same for the previously proposed 78-unit project and the 68-unit revised site plan project.

4.12 TRAFFIC AND CIRCULATION

Both the previously proposed 78-unit Comstock Homes Development and the 68-unit revised site plan project would result in Class I impacts to traffic and circulation associated with generation of peak-hour trips at the intersection of Storke Road and Hollister Avenue (Impacts Traffic-2 and Traffic-6 in the FEIR). Although the revised site plan would reduce the size of the residential development by 10 units and, thus, the number of new residents, the 68-unit revised site plan project would still exceed the City's traffic impact threshold of 15 P.M. PHT at the

Figures 4.9-1 through 4.9-7
(7 pages, 8½" x 11", color)

intersection of Storke Road and Hollister Avenue. The traffic mitigation measures presented in the FEIR are considered appropriate for the revised site plan project but would not be adequate to avoid the Class I impact findings for Impacts Traffic-2 and Traffic-6. The revised site plan would result in less operational increases in traffic due to less residential units and residents. The revised site plan would involve less construction truck traffic associated with building material deliveries. However, the revised site plan would involve more construction truck traffic associated with removal of excess cut material (estimated at 7,000 yd^3). The applicant estimates that approximately 470 truck trips (round trips) will be required to haul the excess cut material offsite (MAC Design, 2004). Assuming a 2-month site preparation period, about 10-11 truck trips (round trips) per day would be required on average to dispose of the excess cut material.

In summary, the 68-unit revised site plan would result in less long-term impacts on traffic and circulation than the previously proposed 78-unit project. However, the 68-unit revised site plan would still result in Class I impacts (project specific and cumulative) to traffic and circulation at Storke Road and Hollister Avenue.

4.13 NOISE

Both the previously proposed 78-unit Comstock Homes Development and the 68-unit revised site plan project would result in Class I noise impacts (Impacts N-2 and N-3; Construction Noise). The 68-unit revised site plan would involve less construction than the previously proposed 78-unit project due to 10 fewer residential units and 46 percent less 2 story homes (i.e., 46 percent of previously proposed 2 story homes converted to 1 story under revised site plan). The revised site plan would require less grading but more export of excess cut material than the previously proposed 78-unit project. The additional truck traffic required to haul and export the excess cut soil material would contribute to Class I construction noise impacts for several months. The planned sewer lift station will have an underground (submerged) electrical pump with an emergency diesel-powered generator backup. The submerged electrical pump is expected to be inaudible at the fenceline. The backup diesel generator would generate noise on a periodic, but infrequent basis (e.g., twice per year during 1-hour event) during safety testing. In the event of an electrical outage lasting more than 12-20 hours, the emergency backup diesel generator would be used and generate noise until electrical power was restored. No significant noise impacts are expected to result from the infrequent operation of the backup diesel generator.

Construction noise impacts associated with the relocated parking lot and restroom in the Open Space area (Impact N-2) would be the same for the previously proposed 78-unit project and the 68-unit revised site plan project (i.e., both Class I). The lowered elevation of the northeastern residential pod would negate the need for the previously proposed sound wall south of Hollister Avenue. No adverse noise impacts associated with the change are expected.

4.14 AIR QUALITY

Both the previously proposed 78-unit Comstock Homes Development and the 68-unit revised site plan would result in Class I impacts to air quality related to residential ROG emissions

(Impacts AQ-3 and AQ-9). Although both the revised 68-unit and previously proposed 78-unit projects would result in Class I air quality impacts, the 68-unit revised site plan would contribute less ROG emissions due to 10 fewer residential units and fewer residents driving motor vehicles.

The periodic, infrequent use (e.g., estimated at 2 hours per year under normal conditions) of the emergency backup diesel generator at the sewer lift station will not result in significant air quality related effects.

4.15 PUBLIC SERVICES

Neither the previously proposed 78-unit Comstock Homes Development nor the 68-unit revised site plan project would result in any Class I impacts on public services. The demand for public services would be similar for the previously proposed 78-unit project and the 68-unit revised site plan project. The 68-unit revised site plan would be expected to place incrementally less demand for most public services due to 10 fewer residential units and fewer residents. The 68-unit revised site plan project would utilize more electricity than the previously proposed 78-unit project for operation of the electrically powered sewer lift station pumping facilities (i.e., versus the previously proposed gravity flow system to the GWSD Devereux Creek trunkline).

4.16 CONCLUSIONS

The revised 68-unit project would not result in new Class I or Class II impacts and would not result in a substantial increase in severity of previously identified Class I or Class II impacts. The 68-unit revised site plan project would result in two previously identified Class I impacts (i.e., Impact BIO-3, Monarch Butterflies; and BIO-5, Nesting Habitat for Raptors and Loggerhead Shrikes) becoming Class II impacts (refer to Table 4-1). The 68-unit revised site plan project is considered to be environmentally preferable to the originally proposed 78-unit project.

Table 4-1.
Comparison of Class I Impacts for Previously Proposed 78-Unit Project and 68-Unit Revised Site Plan

Resource Area	Identified Class I Impacts for Previously Proposed 78-Unit Project[1]	Identified Class I Impacts for 68-Unit Revised Site Plan	Comments
4.4 Biological Resources	Impact BIO-3: Monarch Butterflies.	Not applicable; Class II	The 68-unit revised site plan would avoid Class I impacts to all eucalyptus woodland/raptor ESHAs and setback buffers (including the monarch butterfly aggregation site near the southwest corner of the site), and would not require the removal of the eucalyptus trees/windrow along the southwestern border of the residential development footprint (refer to Figure 1-2). The 68-unit revised site plan would also avoid the eucalyptus woodland/raptor ESHA and 100-foot setback buffer to the east of the development (refer to Figure 1-2). Residual Class II impacts are due to potential disturbance caused by increased population and disturbance by development in close proximity to habitat.
4.4 Biological Resources	Impact BIO-4: Roosting and Foraging Habitat for Raptors, Loggerhead Shrikes, and Bats.	Impact BIO-4: Roosting and Foraging Habitat for Raptors, Loggerhead Shrikes, and Bats.	The 68-unit revised site plan would reduce Class I impacts to roosting habitat by preserving the eucalyptus trees on the southwestern border of the site and would avoid encroachment into eucalyptus woodland/raptor ESHA buffers near the southeast border of the site. Conversely, the previously proposed 78-unit project would have impacted the eucalyptus woodland/raptor ESHA and setback buffers on the southwest part of the site. However, the 68-unit project, as well as the originally proposed 78-unit project, would result in a loss of foraging habitat due to the residential development displacing habitat for prey species.
4.4 Biological Resources	Impact BIO-5: Nesting Habitat for Raptors and Loggerhead Shrikes.	Not applicable; Class II	The 68-unit revised site plan would move the proposed residential development approximately 100 feet to the east in the vicinity of the eucalyptus windrow near the southwest border of the residential development footprint. Although the 68-unit revised site plan would shift the residential development footprint further to the south and locate four homes in the area previously proposed for the southern detention basins, it would maintain the minimum 100-foot setback which is applicable to the eucalyptus woodland/raptor ESHA to the south and southwest of the southwest corner of the development (refer to Figure 1-2), thereby avoiding the Class I impact. The 68-unit revised site plan would not encroach into the eucalyptus woodland/raptor ESHA or buffers and is located several hundred feet north of the historical White-tailed Kite

Table 4-1 (Continued).
Comparison of Class I Impacts for Previously Proposed 78-Unit Project and 68-Unit Revised Site Plan

Resource Area	Identified Class I Impacts for Previously Proposed 78-Unit Project[1]	Identified Class I Impacts for 68-Unit Revised Site Plan	Comments
			and Cooper's Hawk nest sites, which were located near the southern end of the overall ESHA.
4.4 Biological Resources	Impact BIO-9: Native Grassland.	Impact BIO-9: Native Grassland.	The originally proposed 78-unit layout and the 68-unit revised site plan layout would have similar impacts on native grassland.
4.4 Biological Resources	Impact BIO-24: Cumulative Impact to Wildlife Resources	Impact BIO-24: Cumulative Impact to Wildlife Resources	The originally proposed 78-unit layout and the 68-unit revised site plan layout would have similar cumulative impacts on wildlife resources in the Devereux Slough Ecological System.
4.9 Visual Resources	Impact VIS-1: KOPs G-2(A), G-6, G-7, and G-8.	Impact VIS-1: KOPs G-2(A), G-6, G-7, and G-8.	The 68-unit revised site plan would substantially reduce visual effects compared to the originally proposed 78-unit layout associated with the following factors: 1) 10 fewer residential units; 2) conversion of 46 percent of the homes from 2 story to 1 story, including many of the perimeter units (refer to Figure 1-2); 3) deletion of one unit in the northern pod area south of Hollister Avenue near Drainage A-2; 4) substantial lowering (4-12 feet depending on area) of grade elevation in northern pod area to reduce overall height of homes and associated blockage of views (of the Pacific Ocean from Hollister Avenue and the Santa Ynez Mountains from the Open Space Area); 5) retention of eucalyptus windrow along southwest border, which screens views from Sandpiper Golf Course; 6) establishment of 20-foot buffer along the northwest portion of the site preserving the majority of the eucalyptus trees in this area which create a natural vegetative screen; 7) establishment of a 10-foot buffer long the northern portion of the site (south of Hollister Avenue) preserving many of the trees in the buffer zone that create a natural vegetative screen; and 8) deletion of the sound wall that was previously proposed between the northeastern residential pod and Hollister Avenue. Although the 68-unit revised site plan substantially reduces visual effects relative to the previously proposed 78-unit project, the 68-unit revised site plan would still result in a Class I impact for Impact VIS-1.

Table 4-1 (Continued).
Comparison of Class I Impacts for Previously Proposed 78-Unit Project and 68-Unit Revised Site Plan

Resource Area	Identified Class I Impacts for Previously Proposed 78-Unit Project[1]	Identified Class I Impacts for 68-Unit Revised Site Plan	Comments
4.9 Visual Resources	Impact VIS-7: Loss of Scenic Coastal Vistas and Open Space.	Impact VIS-7: Loss of Scenic Coastal Vistas and Open Space.	The 68-unit revised site plan would reduce project-specific and cumulative visual effects compared to the originally proposed 78-unit project as discussed above under Impact VIS-1.
4.10 Recreation	Impact REC-3: Residential Rezone and Development.	Impact REC-3: Residential Rezone and Development.	The originally proposed 78-unit layout and the 68-unit revised site plan layout would have similar impacts related to the residential rezone and development.
4.10 Recreation	Impact REC-5: Open Space Plan Trail Closures.	Impact REC-5: Open Space Plan Trail Closures.	The 68-unit revised site plan would reduce the extent of trail closures within the 36-acre Comstock Homes envelope, so that there would not be a net reduction in length of trails.
4.10 Recreation	Impact REC-6: Open Space Plan Trail User Restrictions.	Impact REC-6: Open Space Plan Trail User Restrictions.	The originally proposed 78-unit layout and the 68-unit revised site plan layout would have the same effect on trail user restrictions.
4.10 Recreation	Impact REC-8 (Cumulative Impacts): Cumulative Increase in Open Space Usage.	Impact REC-8 (Cumulative Impacts): Cumulative Increase in Open Space Usage.	The originally proposed 78-unit project and the 68-unit revised site plan would have similar cumulative effects on open space usage, although the 68-unit project would reduce the contribution to cumulative effects due to 10 fewer units and, thus, fewer new residents adjacent to the Open Space area.
4.12 Traffic and Circulation	Impact Traffic-2: P.M. Peak Hour Trips/Impacts at Hollister Avenue/Storke Road Intersection.	Impact Traffic-2: P.M. Peak Hour Trips/Impacts at Hollister Avenue/Storke Road Intersection.	The originally proposed 78-unit project and the 68-unit revised site plan would have similar project-specific P.M. peak-hour impacts at the intersection of Storke/Hollister, since they would both exceed the City's traffic impact threshold of 15 P.M. PHT. However, the 68-unit revised site plan project would reduce impacts at this intersection compared to the originally proposed 78-unit project due to fewer new residents and associated vehicular trips generated.
4.12 Traffic and Circulation	Impact Traffic-6. Cumulative Impact on Intersection of Storke Road/Hollister Avenue	Impact Traffic-6. Cumulative Impact on Intersection of Storke Road/Hollister Avenue	The originally proposed 78-unit project and the 68-unit revised site plan would have similar cumulative traffic effects on the intersection of Storke/Hollister, which is already operating at LOS E. However, the 68-unit revised site plan project would contribute a lower trips volume (due to fewer new residents) than the originally proposed 78-unit project at this over-capacity intersection.

Table 4-1 (Continued).
Comparison of Class I Impacts for Previously Proposed 78-Unit Project and 68-Unit Revised Site Plan

Resource Area	Identified Class I Impacts for Previously Proposed 78-Unit Project[1]	Identified Class I Impacts for 68-Unit Revised Site Plan	Comments
4.13 Noise	Impact N-2: Construction Noise (Residential Development).	Impact N-2: Construction Noise (Residential Development).	The originally proposed 78-unit project and the 68-unit revised site plan project would result in similar construction noise impacts. However, the 68-unit revised site plan project would potentially have a shorter construction timeframe due to the smaller number of units to be constructed (i.e., overall duration of construction noise would be shorter). Additionally, the 46 percent reduction in 2-story homes would likely reduce the overall duration of construction activities and associated noise. The 68-unit revised site plan project would involve more construction truck traffic for hauling excess cut soil material (estimated at 7,000 cubic yards)(previously proposed 78-unit project anticipated the need to import 300 cubic yards of material). Comstock Homes estimates that an additional 470 round trip truck trips will be required to haul this material offsite. Assuming a 2-moth timeframe for earthwork, about 10-11 round trip truck trips on average would be required per day. This additional truck traffic would contribute to the Class I Impact N-2.
4.13 Noise	Impact N-3: Construction Noise. (Parking Lot and Restroom Facilities).	Impact N-3: Construction Noise. (Parking Lot and Restroom Facilities).	The originally proposed 78-unit project and the 68-unit revised site plan project would have identical construction noise impacts for this offsite, non-residential project component.
4.14 Air Quality	Impact AQ-3: Residential Emissions (ROG).	Impact AQ-3: Residential Emissions (ROG).	The originally proposed 78-unit project and the 68-unit revised site plan project would have similar ROG emission related impacts. However, the 68-unit revised site plan project would have fewer units and thus less potential for wood burning emissions and fewer associated vehicular traffic emissions. The emergency backup diesel generator for the sewer lift station (associated with 68-unit revised site plan project, but not originally proposed 78-unit project) would be used infrequently for short periods of time (e.g., estimated at about 2 hours per year under normal conditions). No significant air quality effects are anticipated for this added project component.

Table 4-1 (Continued).
Comparison of Class I Impacts for Previously Proposed 78-Unit Project and 68-Unit Revised Site Plan

Resource Area	Identified Class I Impacts for Previously Proposed 78-Unit Project[1]	Identified Class I Impacts for 68-Unit Revised Site Plan	Comments
4.14 Air Quality	Impact AQ-9: Cumulative Residential Emissions (ROG).	Impact AQ-9: Cumulative Residential Emissions (ROG).	The originally proposed 78-unit project and the 68-unit revised site plan project would have similar cumulative ROG emission related impacts. However, the 68-unit revised site plan project would have fewer units and thus less potential for contributing to cumulative wood burning emissions and fewer associated cumulative vehicular traffic emissions. As discussed under Impact AQ-3 (above), the emergency backup diesel generator associated with the sewer lift station is expected to operate very infrequently and only for short periods of time. The emergency backup diesel generator would not be expected to contribute appreciably to cumulative residential emissions.

[1] Please refer to Table ES-1 in the Executive Summary in the FEIR for a more complete description of the impacts as well as mitigation measures relative to the originally proposed 78-unit project.

[2] The Class II impacts identified in the FEIR (see Table ES-1 in the Executive Summary in the FEIR) for the previously proposed 78-unit project, including accompanying mitigation measures required to reduce these potentially significant impacts to levels of insignificance, are also applicable to the 68-unit revised site plan project. Exceptions include mitigation measures that are no longer applicable (e.g., noise wall along Hollister Avenue is no longer needed since homes in the northeastern residential pod have been substantially lowered in elevation and would be surrounded by a retaining wall), or where mitigation measures refer to residential lots that have been deleted in the 68-unit revised site plan.

SECTION 5.0
REFERENCES

MAC Design Associates. 2004. Revised Site Plan and Preliminary Grading and Drainage Plan. Dated June 16, 2004. Received by City of Goleta on June 18, 2004.

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